
DECLARATION OF GEORGE S. DOWELL

1. My name is George S. Dowell. I am Vice President for Strategic Planning and Implementation of Verizon Advanced Data Inc. (VADI). VADI is Verizon's separate data affiliate. My responsibilities currently include directing the program teams that develop and implement all of the operating support systems, processes, and work centers necessary for VADI to provision and maintain DSL and other advanced services throughout the areas in which Verizon's local telephone operating companies¹ provide local exchange service. I am also responsible for obtaining the required state and federal regulatory approvals for VADI to provide DSL and other advanced services.

2. I have more than 18 years experience in the telecommunications industry, in a variety of engineering and operations positions working for NYNEX, Bell Atlantic, and now VADI. Prior to the merger of Bell Atlantic and GTE, I was Vice President-Operations Excellence for Bell Atlantic Network Services, Inc. My responsibilities included the design, implementation, and reporting of all service measurements for the Bell Atlantic local operating telephone companies. In addition, I was responsible for ensuring the operational readiness of all wholesale products and services.

3. I hold a Bachelor of Science degree in Engineering from the United States Military Academy, and a Master of Science in Engineering Management from the University of Missouri.

¹ These companies include Verizon New York Inc., Verizon Delaware Inc., Verizon Maryland Inc., Verizon New Jersey Inc., Verizon Pennsylvania Inc., Verizon Virginia Inc., Verizon Washington, DC Inc., Verizon West Virginia Inc., Verizon California Inc., Verizon Florida Inc., Verizon Hawaii Inc., Verizon Mid-States, Verizon Midwest, Verizon North, Inc., Verizon North Systems, Verizon Northwest, Inc., Verizon South Inc., Verizon South Systems, Verizon Southwest, Verizon West Coast Inc., Puerto Rico Telephone Company, and The Micronesian Telecommunications Corp.

4. VADI is incorporated in Delaware. VADI currently serves customers in Connecticut, Delaware, Maine, Massachusetts, New Hampshire, New York, Pennsylvania, Rhode Island, and Vermont, as well as in twenty other jurisdictions. VADI first began operating in New York, and it has been fully operational in New York and Connecticut since July 2000. VADI has been fully operational in Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont since November 2000, and in Pennsylvania and Delaware since December 2000.

5. VADI uses the CORBA and the Web GUI interfaces to obtain access to Verizon's OSS for pre-ordering functions. These are the same CORBA and Web GUI interfaces used by CLECs operating in the former Bell Atlantic service areas for pre-ordering.

6. VADI uses an Electronic Data Interchange (EDI) interface to obtain access to Verizon's OSS for ordering. This is the same EDI used by CLECs operating in the former Bell Atlantic service areas to obtain access to Verizon's ordering OSS.

7. Before Verizon's retail offering of DSL services was moved to VADI, its retail representatives obtained pre-order loop qualification information limited to a Y/N (yes or no) response on whether the loop was qualified for Bell Atlantic's retail Infospeed offering, and which of the retail service(s) were supported. With the implementation of the CORBA and Web GUI interfaces, VADI representatives now have access to the same pre-ordering loop qualification information CLECs do. VADI has participated in the collaborative process described in Mr. Kelly's Declaration and will continue to follow the same processes for obtaining access to loop qualification information as CLECs do.

8. Beginning in July 2000, VADI began to submit all of its pre-order transactions for New York and Connecticut through the wholesale CORBA and Web GUI interfaces. Beginning in November 2000, VADI began to submit all of its pre-order transactions for Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont through the wholesale CORBA and Web GUI interfaces. Beginning in December 2000, VADI began to submit all of its pre-order transactions for Pennsylvania and Delaware through the wholesale CORBA and Web GUI interfaces. Since those dates, VADI has used the same CORBA and Web GUI interfaces that are available to all unaffiliated CLECs operating in the former Bell Atlantic service areas for 100% of the pre-ordering transactions it has submitted to Verizon.

9. On the dates noted above, VADI began using the ordering interfaces provided by the Verizon local telephone operating companies to submit orders. VADI has contracted with a third-party service bureau offered by Telcordia to submit wholesale orders to the Verizon local telephone operating companies. A system known as Delivery, which VADI has licensed from Telcordia, transmits the order information needed to submit a line sharing order to Verizon's local telephone operating companies from VADI's systems to that service bureau. The service bureau primarily submits its orders to the Verizon local telephone operating companies over the EDI interface (using LSOG 2), although at times it uses the Web GUI interface. Both the EDI and Web GUI interfaces are available to all CLECs. In addition, CLECs can contract with Telcordia to provide this service. Through December 2000, VADI has submitted more than 96% of its orders in this manner.

10. This concludes my Declaration.

I, George S. Dowell, hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.


George S. Dowell

DECLARATION OF DAVID J. KELLY

1. My name is David J. Kelly. I am the Director in Verizon responsible for the development and implementation of processes and systems required to ensure the operational readiness of Unbundled Network Elements (UNEs) deployed in the former Bell Atlantic service areas of Verizon. In particular, I have represented Verizon with respect to operations support systems (OSS) issues in the DSL collaborative under the auspices of the New York Public Service Commission (PSC).

2. I hold a Bachelor of Arts degree in Economics from Tufts University and a Master of Business Administration from Boston College.

3. The purpose of my statement is to describe the OSS interfaces that both unaffiliated carriers and Verizon Advanced Data Inc. (VADI) use for pre-ordering and ordering transactions with Verizon.¹ The ability to perform both pre-ordering and ordering transactions for advanced services using the interfaces has been developed after collaboration with competitive local exchange carriers in the DSL collaboratives in New York and through the Change Management Process.

4. In August 1999, the New York PSC convened a collaborative process involving Verizon and all interested competitive DSL providers to address issues associated with ordering and provisioning of DSL loops that competitive providers thought were important. The collaborative has generally met bi-weekly since its inception (in some months, meetings have been more frequent, and over the holidays, the group may only have had one meeting in a month). Among the issues addressed by the

¹ On June 30, 2000, Bell Atlantic Corporation completed its merger with GTE Corporation, creating Verizon Communications Inc. Since Bell Atlantic is now Verizon,

collaborative were loop qualification for loop ordering and line sharing. Verizon agreed that solutions developed through this collaborative would be implemented throughout the Bell Atlantic service areas. VADI is and has been a participant in these collaboratives.

Pre-Ordering

5. Verizon offers three pre-ordering interfaces. Two are application-to-application interfaces: Electronic Data Interchange (EDI) and Common Object Request Broker Architecture (CORBA). The third is a Web-based Graphical User Interface (Web GUI). All three interfaces provide carriers – CLECs and VADI – with the ability to obtain loop qualification information on a mechanized basis.

6. At the time the Section 271 application for New York was approved, Verizon's retail representatives selling advanced services received less pre-order information than CLEC representatives selling similar services. At that time, Verizon's retail representatives obtained pre-order loop qualification information limited to a Y/N (yes or no) response on whether the loop was qualified for Bell Atlantic's retail Infospeed offering, and which of the retail service(s) were supported. The mechanized pre-ordering loop qualification available to CLECs returned the information available to Verizon's retail representatives plus loop length information. In March 2000, based on the collaborative discussions, Verizon enhanced the wholesale loop qualification transaction to indicate whether the loop was disqualified due to interference, an engineering work order in progress, incompatible loop technology (e.g. digital loop carrier (DLC), digital single subscriber carrier (DSSC), no copper available) or load coils.

I will refer to the company as Verizon whether I am talking about something that occurred before or after the merger was completed.

Ordering

7. Verizon provides carriers – CLECs and VADI – a choice of two interfaces for submitting local service requests (LSRs) – EDI and the Web GUI. Both interfaces provide these carriers with the ability to submit orders electronically for UNE DSL-capable loops and line sharing.

8. Verizon implemented the ability to order DSL-capable loops in March 1999. Implementation of the necessary changes to the interfaces and business rules was accomplished pursuant to the Change Management Process that Verizon adopted for the entire former Bell Atlantic service areas. Approximately 550 CLECs are on the Change Management distribution list and received notice of the specifications and rules for ordering DSL services and loops.

9. Verizon implemented the ability to order line sharing using LSRs submitted over the EDI and Web GUI interfaces in June 2000. Implementation of the necessary changes to the interfaces and business rules was accomplished pursuant to the Change Management Process described above.

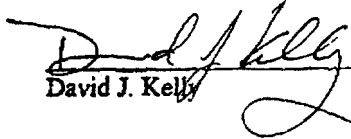
Transactions from Verizon Advanced Data Inc.

10. VADI uses the same CORBA and Web GUI interfaces provided to unaffiliated CLECs for pre-ordering. Since July 2000, Verizon has not received any pre-order transactions from VADI for New York and Connecticut over any other interface. Since November 2000, Verizon has not received any pre-order transactions from VADI for Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont over any other interface. Since December 2000, Verizon has not received any pre-order transactions from VADI for Pennsylvania and Delaware over any other interface.

11. VADI uses the same EDI and Web GUI interfaces provided to unaffiliated CLECs for ordering. Through December 2000, Verizon has received more than 96% of VADI's ordering transactions for Connecticut, Delaware, Maine, Massachusetts, New Hampshire, New York, Pennsylvania, Rhode Island, and Vermont through these interfaces.

12. This concludes my Declaration.

I, David J. Kelly, hereby swear, under penalty of perjury, that the foregoing is true
and correct, to the best of my knowledge and belief.


David J. Kelly

AGENDA
PRTC MEETING
SEPTEMBER 9, 1999

BILLING:

1. There are several issues that will be addressed on Billing that may require a more detailed analysis and we have policy issues that are still pending and need to be addressed. There is the possibility that we may consider dividing the group, so we may have the opportunity to discuss all the important billing issues.
2. Pro-rating on recurring charges - Now that we know that PRTC has the ability to pro-rate as seen in this months billing, are we going to continue to pro-rate??
3. Will we see pro-rating for usage??
4. Where is our usage for the months of July and August consumed by the end-user??
5. We are being billed for Other Long Distance Charges. What are these??
6. PRTC is mixing cycles and this will cause us many problems in the future with our customers.
7. Why were we billed for Equipment Deposit code 2024?? -
8. Our customer Strong Shield (850-3390) has billing period from: 0 to 22 Aug We need dates to bill
9. Directory charges - Customer has been billed full amount -
10. Small charges for single line Tel equipment. Reseller Manual says there is option to pay \$10.00
11. Customers have more existing features than those billed to us from PRTC

PIC

*We are the
LEC. It's our
customer.*

1. In our last meeting held on July 14, Mr. Jose Arias of Equal Access agreed to give us the ability to have our local customer's lines PIC'd manually (no more than 20 a day) until we can do so electronically in our Graphic Interface. Date for electronic interface??
2. Zulma Ramos recently informed us that this support would no longer be provided, why???
3. Who is the request for PIC going to be accepted from?? / *how we going to be the only entity, under TCSI Code - What is the implementation status / to send PIC for its Customer base change*

RFY

1. Once customer flips it's status to "15" we can no longer see information on the screen
2. We cannot see the PIC status on the screen after it flips it's status from 13.

PERFORMANCE COORDINATOR

1. In our last meeting Mr. Velazquez said he would provide us with the name of the person holding this position so we in turn could coordinate a meeting.

X RESELLER MANUAL

1. We were told that we would have it by the end of July, 1999. We need it because the information contained in the old manual is not accurate.

TRAINING

PRTC

RESALE HANDBOOK

Performance Standards

A set of performance criteria established between PRTC and other carriers to insure the quality of service to Puerto Rico user community. There are two types of standards: Interval and Percent.

These standards are based on the calendar month.

The "Specified Activity" are those key elements established as part of the Performance Standards. Specified Activities are listed below:

$$\% \text{ Achieved} = \frac{\text{Total Number of Service Order Completed within Applicable Performance Interval Date}}{\text{Total Number of Service Orders Received}} \times 100.$$

The formula below will be used to determine INP efficiency.

INP Provisioning:

$$\% \text{ Achieved} = \frac{\text{Total Number of INP Service Order Completed within Objective 95\% total Number of INP Service Orders Received One (1) Hour of Service Activation}}{\text{Total Number of INP Service Orders Received}} \times 100.$$

Out of Service Repairs:

$$\% \text{ Achieved} = \frac{\text{Total Number of Out of Service Repairs and Restored Total Number of INP Service Orders Received Within Performance Interval Date..}}{\text{Total Number of INP Service Orders Received}} \times 100.$$

Performance Standards are important indicators on the quality of service provided the customer community. As a result, PRTC will establish a new position with the title Performance Coordinator. It will be the role of Performance Coordinator to monitor PRTC's Installation and Repair Services to ensure objectives established are being achieved or exceeded.



The Performance Coordinator shall prepare a monthly summary of service results showing the objective and results achieved. In the first 10 days following the calendar quarter, e.g., January through March, the Performance Coordinator will publish the quarterly results showing monthly performance. The Quarterly Results Summary (QRS) will also show trend lines indicating performance improvement or degradation.

Out of Service Repairs (continued):

The Performance Coordinator shall chair the Telecommunications Performance and Standards Team (TPST). The membership of this team shall consist of the Performance Coordinator and a designated representative from each Reseller and/or CLEC (one per carrier) providing telecommunications service on the island.

The purpose of the TPST is to provide a cooperative venue in which all telecommunications providers can work together to foster a spirit of service improvement. Any specific recommendations which arise from the process, without approval of the Puerto Rico Telecommunications Regulatory Board, are understood to be non-binding on all parties. It is expected, however, that for this process to succeed, all parties will search for reasonable and realistic recommendations which will improve the service quality to the people of Puerto Rico.

The goal of this team is to identify performance problems and to be a focal point to resolve service and performance deficiencies. This is expected to be a team effort with the participation from Resellers and CLECs alike. The Puerto Rico Telecommunications Regulatory Board will have a standing invitation to send a representative to the TPST meetings. The TPST has the right to change or modify the Performance Standards, subject to Puerto Rico Telecommunications Regulatory Board approval.

PRTC will be responsible for providing quarterly service reports which accurately depict the level of service provided for each major installation and repair category. The Puerto Rico Resellers and/or CLECs may also prepare their own reports using their own statistics.

Disputes

The TPST is the forum to resolve service disputes and substandard performance. Should the TPST be unable to resolve the dispute, all parties have the right to appeal to the Puerto Rico Telecommunications Regulatory Board for relief.

Note:

The CLEC community recognizes that Puerto Rico suffers from severe tropical storms including hurricanes. Such storms can and do cause serious damage to the island's telecommunications infrastructure. During hurricane season, the CLEC community, with the board's concurrence, would waive the PRTC performance requirements on Out of Service Repairs. The Out of Service Repairs requirement will be reinstated as soon as telephone services disrupted by the storm have been restored.





September 9, 1999

Mr. David Bogaty
President
Worldnet Telecommunications
San Juan, Puerto Rico 00936

Dear Mr. Bogaty:

The following are the answers to a number of questions that you have raised in recent letters and phone calls. We should discuss them at our meeting on September 9, 1999 to insure that we are in agreement.

- Regarding who to call when the customer has a problem - In all cases, the end user should be calling WorldNet to report their problems.
- Repair - WorldNet should first verify that the problem involves PRTC equipment and/ or facilities. If so, the problem should be reported to the Repair Center at 721-6565.
- Service Changes - Customer discusses changes with WorldNet. WorldNet calls the Service Coordinator at 783-7373.
- Billing Questions - Customer discusses with WorldNet. WorldNet calls Billing Coordinator at 749-3500.
- Regarding your comment about how customers are handled when they call PRTC - Procedures are in place indicating that customers of Resellers are to be politely turned back to the Reseller if they call into one of PRTC's offices directly. As a result of your comment, a letter has been drafted reemphasizing the correct procedure to be followed and stressing the customer relationship that exists between WorldNet and PRTC.

*Try to create
an escalation
list to obtain
results.*

Mr. David Bogaty
September 9, 1999
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- Repair and Installation Interval Guidelines that appear in the manual represent objectives that PRTC has established and is trying very hard to meet. Unfortunately, we know that there will be occasions when the objectives will be missed. We hope such instances will be infrequent. *

- The Coordinators for order processing are Sonia Domenech and Eva Oliver. A Performance Coordinator for installation and repair has not yet been appointed.

- ~~Pertaining to your request concerning the 11 cents per minute rate for intra-island calls, we had set a meeting to discuss this issue with our Long Distance Subsidiary.~~

- Regarding the billing problems you are experiencing, we appreciate you calling these to our attention. Although we are forwarding the issues to the attention of the Billing and ISO Departments, it would be helpful if you would formally document all of the problems you have experienced in a letter to me so we are sure we have all of them on record. Billing will attempt to resolve them as soon as they can.

- ~~Regarding the customer who was PLOC'd and later had an order for a P1 completed~~
by PRTC - the procedure calls for the withdrawal of any pending order associated with the billing number of the account being PLOC'd. However, if an order is not in order that is associated with the main billing number, we cannot establish a relationship between those lines and the pending order would not be withdrawn but rather completed as a PRTC order. It is important to realize that a customer can choose to have multiple providers of service. Consequently, the situation you describe, although potentially confusing, would be permitted.

- The revised Reseller Manual will be available in a few weeks. We are in the final editing stage.

- We are discussing the issue of training ~~for the market~~ with Corporate Staff. We expect an answer shortly. Training

- A Task Request has been issued to tender a monthly bill for directory advertising charges. This task request is being worked on at the present time. We will advise you when it is complete. → Not fixed

Code 15 - The coordinator is in the process
PLOC -

Mr. David Bogaty
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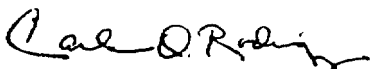
We do not have to wait to have the account PLOC'd, as long as we have submitted a signed LOA.

Therefore next day of BC

- When WorldNet sends PIC changes to the Equal Access Division of PRTC it should only include customers who have already been PLOC'd to WorldNet. PIC changes from Sprint customers must be forwarded by the end user or the carrier in a different request.
- At the current time, there is nothing in the CARE System that would enable PRTC to reject a request for a PIC change from a customer who has been PLOC'd to WorldNet. Our current view is that the customer should have the right to directly request a PIC change from PRTC.
- Customers with voice mail, internet or any other non network service will continue to have the service billed by PRTC after they have been PLOC'd.
- ~~We are currently investigating the status of the billing for the August 7th period. There was an imbalance in the bill, which we are attempting to resolve. We will keep you advised.~~
- Charges for usage and long distance calling are billed in arrears and subsequently will not appear on the 1st month's bill after the customer is PLOC'd. Only local service charges, which are billed in advance, will appear on the 1st bill.
- Billing for account code 2024 needs to be revised. A Task Request is being issued to correct this problem.
- Regarding the billing of 911 services - PRTC will bill WorldNet for this service. WorldNet must collect the charge from each customer and remit the payment to PRTC who will forward the amount to the proper authority. The manual will be updated to reflect this procedure.

Never done

Cordially,



Carlos O. Rodríguez
Wholesale Service Department

C: CPA Juan Velázquez



MINUTES RESELLER MEETING PRT NOVEMBER 16, 2000

ATTENDEES:

Alicia Caballero
Angel Cordero
Carmen Diaz
Graciela Nieves
Juan Velásquez
Gloria Mulett
David Bogaty

BTN's in Status 24:

1. Ms. Carmen Diaz said that they would discuss the problem we presently have with BTN's in status 24 with the Retail Group during a committee meeting on Friday 11/17/2000. Carmen recognizes the need for a solution and said she can move the POTS, but equipment orders she needs to consult, she will get back to us next week.

New Service Orders

2. Mr. Velazquez showed us his concern and explained his commitment to help us get these orders completed.
 - a. He will meet with Mr. Jose Luis Cruz to discuss the amount of orders we have pending and establish a reasonable time frame for completion.
 - b. Mr. Velazquez was also to address with Mr. Cruz the situation we are presently having with defective pairs when the installer visits the site. This problem has been presented on several occasions, but it is up to now that it will be presented for solution.

Reseller Manual

3. Graciela Nieves working on Manual. Has no definite time frame. We all agreed that it is best to work on the Manual together (WorldNet) we will begin to work on procedures and policies in our next Operations Meeting. It is understood that what we as a group agree on as procedures and policies for Manual is subject to final approval of Mr. Velazquez.

Investigation Parameters

4. Graciela understands that investigations will not take so long in the future. She explains it took long to process the recent investigations because of the amount submitted.

Government Accounts

5. Mr. Velazquez and Mrs. Caballero agreed to our request to allow WorldNet 60 days to pay government accounts.

Interim Parity to View PIC

6. For now we are requesting PIC to Equal Access Group

Requested Attendees

7. All present

Update on Intra-Island Long Distance Rates

8. Subject not discussed

Graciela
Nieves

To: Mr. Juan Velazquez CPA
From: Gloria Mulett
Date: 11/14/00
Meeting Date: November 16, 9:30
Re: Meeting Agenda

1. BTN's in 24 statuses are far outside of acceptable parameters
 - a. BTN's continue to receive orders for new services while waiting to transfer to WorldNet
 - b. WorldNet will continue to be patient with the resolution and will request credit for PON's beyond acceptable time frame.
 1. THIS TIME FRAME AFTER WHICH WORLDNET WILL DISPUTE NEEDS TO BE ESTABLISHED.
 2. RESOLUTION OF THE DELAY TIME FRAME NEEDS TO BE ESTABLISHED. WORLDNET'S CREDIBILITY IS BEING IMPACTED.
 3. NEED TO SET APPROPRIATE PROCEDURE TO MONITOR SERVICE ORDERS THAT ARE DELAYING TRANSFER.
2. NEW SERVICE ORDERS
 - a. It is time to establish time parameters for new orders, both POTS and Special Services. The time has been increasing for installation and is reach ridiculous levels in some cases. The manual recommends parameters. These are two to three years old so is it reasonable that PRTC can at least abide by these?
 - b. The Performance Coordinator was proposed by PRTC in the Reseller Manual and was brought up again last year. This is needed. Can we implement this? This position should have the authority and responsibility to monitor and audit Reseller's requests for new service orders, repairs, PLOC, PIC and service in general.
3. RESELLER MANUAL
We feel it is necessary to set a definitive date to complete this manual. It should be completed in conjunction with WorldNet.
4. INVESTIGATION PARAMETERS
 - a. According to Puerto Rico regulation investigations stemming from disputes are to be concluded and answered in 30 days. This is not happening.
5. GOVERNMENT ACCOUNTS
 - a. PRT allows government accounts 90 to 120 days for payment. We request the ability to extend payment for Government accounts to 120 days.
6. PIC
 - a. Status of interim parity to view PIC. Discussion of how it's working.
7. REQUESTED ATTENDEES
 - a. Carmen Diaz
 - b. Graciela Nieves
 - c. Alicia Caballero
 - d. Angel Cordero
 - e. Juan Velazquez
8. Update on Intra-Island Long Distance rates

60 days.
we can
shut down

11/16

PRT is not informing the retail

Status 24

1- The order in 24 will be presented before a Committee with Retail to solve the moving of all lines held here.

Rookie can move POTS but not equipment
To move equipment they will meet with them on Friday

Mr. Velazquez is committed to help us

Pares Defectuosos: - se va a reunir con el personal de esa Jose Luis Cruz - Operations

